

Amendments to the Drawings:

The attached twelve (12) sheets of drawings in Exhibit D include a new Fig. 3A ("New Sheet" 4 of 12). The original Fig. 3 (original sheet 4 of 11) is now Fig. 3B ("Replacement Sheet" 5 of 12). No annotated sheets are attached because Fig. 3A is new and the only change to Fig. 3B is the figure number.

Attachment: Eleven (11) "Replacement Sheets" and one (1) "New Sheet"

REMARKS

Responsive to the Final Office Action mailed January 27, 2006, Applicants have studied the Examiner's comments and the cited art. Claims 43, 44, 46, 48-54, 56-61, 64-68 and 70-87 were pending, with claims 43, 44, 48-54, 56-61, 64-67, and 70-77 previously allowed before the current amendments. Following entry of this Amendment with the addition of claims 88-98, claims 43, 44, 46, 48-54, 56-61, 64-68, 70-78, 88-98 are pending. In view of the following remarks, Applicants respectfully submit that the application is in condition for allowance.

March 13, 2006 Telephonic Interview

On March 13, 2006, the undersigned faxed the Examiner proposed amendments to pending claims 46 and 78, as well as proposed new claims. In a follow-up conversation where the proposed claim amendments and proposed new claims were discussed, the Examiner requested an RCE be filed so that the claim amendments and proposed new claims could be formally examined.

Replacement and New Drawing Sheets

Applicants have added a new drawing sheet ("New Sheet" 4 of 12) with Fig. 3A. Original Fig. 3 (original sheet 4 of 11) is now Fig. 3B ("Replacement Sheet" 5 of 12). No annotated sheets are attached, because Fig. 3A is entirely new and the only change to Fig. 3B is the figure number. "Replacements Sheets" 1 of 12 to 3 of 12 and 5 of 12 to 12 of 12 are only provided with new numbering of sheets.

New Fig. 3A is adapted from Fig. 3 of U.S. Patent No. 5,662,181, which was incorporated by reference in the original specification at paragraph [0013]. Pursuant to MPEP 608.01(q), no new matter has been introduced. The reference numbers have been changed from those used in the '181 patent for uniformity throughout the detailed description of the present application.

Substitute Specification:

Applicants herewith submit a substitute specification in accordance with 37 C.F.R. § 1.121(b)(3) and 1.125, MPEP 608.01(q) and MPEP 714. Applicants respectfully request that the substitute specification replace the existing specification in the present application. Applicants note that an amendment to the written description is specifically allowed in an RCE in 37 C.F.R. § 1.114(c), as referenced in MPEP 706.07(h).

No new matter has been introduced into the specification. The additions to the specification are taken from U.S. Patent No. 5,662,181, which was incorporated by reference in the original specification at paragraph [0013]. Other changes were made as shown, including changes for uniformity of FIG. and FIGS.

As noted in MPEP 714(II)(B) and required in 37 C.F.R. 1.125(c), a separate marked up version showing the changes relative to the original specification is also submitted as Exhibit B.

Amendments

Applicants have amended independent claim 46 to recite in part "an inner member having a radially outward surface rotatable relative to the riser and the inner member having a passage through which a rotatable tubular may extend; a radially outwardly disposed outer member, a plurality of bearings interposed between the radially outward surface of the inner member and the radially outwardly disposed outer member," as discussed during the above-referenced March 13, 2006 telephonic interview.

Applicants have also amended independent claim 78 to recite in part "a pressure relief mechanism in fluid communication with the housing opening," as discussed during the above-referenced March 13, 2006 telephonic interview.

Applicants have also amended claims 43, 46, 48, 49, 51, 53, 54, 56, 57, 58, 59, 60, 65, 66, 70, 71, 74, 75, 76 and 77 and further amended claims 43 and 78 with respective deletions and additions as indicated.

Applicants have further added "New" claims 88-98 and "Cancelled" claims 79-87, which were subject to restriction.

Claim Rejections Under 35 U.S.C. § 103

Claims 46 and 78 are rejected under 35 U.S.C. § 103(a) as being unpatentable over the April 1998 Offshore Drilling with Light Weight Fluids Joint Industry Project Presentation ("Reference II") in view of Harrison, U.S. Patent No. 3,638,721, or vice versa. Applicants respectfully traverse the rejections.

With respect to independent claim 46, Applicants have amended independent claim 46 to additionally recite in part "an inner member having a radially outward surface rotatable relative to the riser and the inner member having a passage through which a rotatable tubular may extend; a radially outwardly disposed outer member; a plurality of bearings interposed between the radially outward surface of the inner member and the radially outwardly disposed outer member." Applicants respectfully submit that, as amended, independent claim 46 is allowable.

With respect to independent claim 78, Applicants have amended independent claim 78 to recite in part "a pressure relief mechanism in fluid communication with the housing opening." Applicants respectfully submit that, as amended, independent claim 78 is allowable.

Other New Claims

Applicants have also added "New" claims 88 to 98 to provide the varied scope of coverage to which Applicants are entitled. Independent claims 93-98 are all the independent

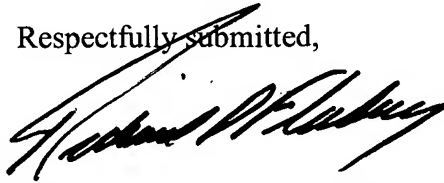
claims filed on December 23, 2005 in European Patent Application No. 05112881.7, a division of European Application No. 00906522.8 that corresponds to the present application, except in claims 93 and 94 "riser" was substituted for "casing."

CONCLUSION

Applicants respectfully submit that all issues and rejections have been adequately addressed, that all claims are allowable, and that the case should be advanced to issuance.

If the Examiner has any questions or wishes to discuss the claims, Applicants encourage the Examiner to call the undersigned at the telephone number indicated below.

Respectfully submitted,



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Date: June 27, 2006

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